

(Del. Rev. 12/98)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ANTHONY CARTER, SR

(Name of Plaintiff or Plaintiffs)

v.

CIVIL ACTION No. 05 - 311

MARMON KEYSTONE

(Name of Defendant or Defendants)

**COMPLAINT UNDER TITLE VII**  
**OF THE CIVIL RIGHTS ACT OF 1964**

1. This action is brought pursuant to *Title VII of the Civil Rights Act of 1964*, as amended, for **employment discrimination**. Jurisdiction exists by virtue of 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff resides at

28 MONTICELLO BLVD

(Street Address)

NEW CASTLE DELAWARE 19720

(City)

(County)

(State)

(Zip Code)

302 322-2830

(Area Code) (Phone Number)

3. Defendant resides at, or its business is located at

100 STEEL DRIVE

(Street Address)

NEW CASTLE DELAWARE 19720

(City)

(County)

(State)

(Zip Code)

4. The discriminatory conduct occurred in connection with plaintiff's employment at, or application to be employed at, defendant's MARMON/KEYSTONE CORPORATION place of business

(Defendant's Name)

located at 100 STEEL DRIVE

(Street Address)

NEW CASTLE DELAWARE 19720

(City)

(County)

(State)

(Zip Code)

5. The alleged discriminatory acts occurred on \_\_\_\_\_ , \_\_\_\_\_ , \_\_\_\_\_ .  
(Day) (Month) (Year)
6. The alleged discriminatory practice ☒ is ☐ is not continuing.
7. Plaintiff filed charges with the Department of Labor of the State of Delaware,  
4425 NORTH MARKET STREET Wilm, DEL 19809  
 \_\_\_\_\_ , regarding  
 \_\_\_\_\_ ,  
 (Agency) (Street Address) (City) (County) (State) (Zip Code)  
 defendant's alleged discriminatory conduct on \_\_\_\_\_ , \_\_\_\_\_ , \_\_\_\_\_ .  
 (Day) (Month) (Year)
8. Plaintiff filed charges with the Equal Employment opportunity Commission of the United States  
 regarding defendant's alleged discriminatory conduct on: 20 , FEB , 04 .  
 (Day) (Month) (Year)
9. The Equal Employment Opportunity Commission issued the attached Notice-of-Right-to-Sue letter  
 which was received by plaintiff on: 15 , MARCH , 05 .  
 (Day) (Month) (Year)

**(NOTE: ATTACH NOTICE-OF-RIGHT-TO-SUE LETTER TO THIS COMPLAINT.)**

10. The alleged discriminatory acts, in this suit, concern:

- A. ☒ Failure to employ plaintiff.
- B. ☒ Termination of plaintiff's employment.
- C. ☒ Failure to promote plaintiff.
- D. ☒ Other acts (please specify below)

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11. Defendant's conduct is discriminatory with respect to the following:

- A. ☒ Plaintiff's race
- B. ☐ Plaintiff's color
- C. ☐ Plaintiff's sex
- D. ☐ Plaintiff's religion
- E. ☐ Plaintiff's national origin

12. A copy of the charges filed with the Equal Employment Opportunity Commission is attached to this complaint and is submitted as a brief statement of the facts of plaintiff's claim.

13. If relief is not granted, plaintiffs will be irreparably denied rights secured by Title VII of the 1964 Civil Rights Act, as amended.

14. Plaintiff's has no adequate remedy at law to redress the wrongs described above.

**THEREFORE, Plaintiff prays as follows: (Check appropriate letter(s))**

- A. ☐ That all fees, cost or security attendant to this litigation be hereby waived.
- B. ☐ That the Court appoint legal counsel.
- C. ☐ That the Court grant such relief as may be appropriate, including injunctive orders, damages, cost and attorney's fees.

**I declare under penalty of perjury that the foregoing is true and correct.**

Dated: 19 MAY 05

  
(Signature of Plaintiff)

\_\_\_\_\_  
(Signature of additional Plaintiff)